

Gina Flores

From: Joshua Lang
Sent: Monday, December 23, 2024 8:41 PM
To: Greg Love
Cc: David Perlson; Chelsea Till
Subject: FW: Valtrus v. Google: Extension request for recently filed motions; Valtrus II Conference

[EXTERNAL EMAIL from jlang@lynnllp.com]



Hi Greg,

We took a closer look at Jason's email below, and it appears to us that Jason is suggesting that our proposed extensions are unopposed on the conditions listed below in my email. Of course, we intend to be reasonable and provide professional courtesy as you have here going forward.

Can you please confirm with Jason Sheasby?

Conditions to Unopposed Motions to Continue:

As to your request for an extension on the response to the motions to consolidate in Valtrus I and II, and Valtrus' Motion to Amend the Complaint in Valtrus I, Valtrus is willing to not oppose an extension from January 8th to January 22nd so long as Google agrees not to use the agreement as a basis to delay the status conference on January 8th in Valtrus II. Please confirm.

Valtrus is willing to not oppose an extension from January 2nd to January 16th for Google's response to the Amended complaint in Valtrus II so long as Google agrees not to use the agreement as a basis to delay the status conference on January 8th in Valtrus II. Please confirm.

--

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jlang@lynnllp.com

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From: Sheasby, Jason <JSheasby@irell.com>

Sent: Monday, December 23, 2024 7:52 PM

To: David Perlson <davidperlson@quinnemanuel.com>; Chelsea Till <ctill@lynnllp.com>; Joshua Lang <jlang@lynnllp.com>

Cc: Love Greg <Greg@stecklerlaw.com>; Proctor, Amy <AProctor@irell.com>; Michael K. Hurst <MHurst@lynnllp.com>; He-Schaefer, Connor <che-schaefer@irell.com>; Julia Simon <jsimon@lynnllp.com>; Tonia Ashworth <TAshworth@lynnllp.com>; QE-Valtrus <qe-valtrus@quinnemanuel.com>; Stickney Judge Paul <judgestickney@stecklerlaw.com>; #Valtrus-Google [Int] <Valtrus-Google@irell.com>; Gina Flores <gflores@lynnllp.com>; Haihang Wang <haihangwang@quinnemanuel.com>; Love Greg <Greg@stecklerlaw.com>; Proctor, Amy <AProctor@irell.com>; Michael K. Hurst <MHurst@lynnllp.com>; He-Schaefer, Connor <che-schaefer@irell.com>; Julia Simon <jsimon@lynnllp.com>; Tonia Ashworth <TAshworth@lynnllp.com>; Stickney Judge Paul <judgestickney@stecklerlaw.com>; #Valtrus-Google [Int] <Valtrus-Google@irell.com>; Gina Flores <gflores@lynnllp.com>; Haihang Wang <haihangwang@quinnemanuel.com>

Subject: Re: Valtrus v. Google: Extension request for recently filed motions; Valtrus II Conference

To be clear, we don't oppose your extensions at all on the stipulations below we just ask for the same courtesy when you file motions against us.

From: Jason Sheasby <JSheasby@irell.com>

Date: Monday, December 23, 2024 at 3:55 PM

To: David Perlson <davidperlson@quinnemanuel.com>, Chelsea Till <ctill@lynnllp.com>, Joshua Lang <jlang@lynnllp.com>

Cc: Love Greg <Greg@stecklerlaw.com>, "Proctor, Amy" <AProctor@irell.com>, "Michael K. Hurst" <MHurst@lynnllp.com>, "He-Schaefer, Connor" <che-schaefer@irell.com>, Julia Simon <jsimon@lynnllp.com>, Tonia Ashworth <TAshworth@lynnllp.com>, QE-Valtrus <qe-valtrus@quinnemanuel.com>, Stickney Judge Paul <judgestickney@stecklerlaw.com>, "#Valtrus-Google [Int]" <Valtrus-Google@irell.com>, Gina Flores <gflores@lynnllp.com>, Haihang Wang <haihangwang@quinnemanuel.com>, Love Greg <Greg@stecklerlaw.com>, "Proctor, Amy" <AProctor@irell.com>, "Michael K. Hurst" <MHurst@lynnllp.com>, "He-Schaefer, Connor" <che-schaefer@irell.com>, Julia Simon <jsimon@lynnllp.com>, Tonia Ashworth <TAshworth@lynnllp.com>, Stickney Judge Paul <judgestickney@stecklerlaw.com>, "#Valtrus-Google [Int]" <Valtrus-Google@irell.com>, Gina Flores <gflores@lynnllp.com>, Haihang Wang <haihangwang@quinnemanuel.com>

Subject: Re: Valtrus v. Google: Extension request for recently filed motions; Valtrus II Conference

David:

There was no confusion. The purpose of this request was to avoid a tactic you have employed in the past.

1. Seek a delay of our motion being briefed
2. File your own motion.
3. Refuse to give us an extension on your motion.

Thanks

JS

From: David Perlson <davidperlson@quinnemanuel.com>

Date: Monday, December 23, 2024 at 3:54 PM

To: Chelsea Till <ctill@lynnllp.com>, Jason Sheasby <JSheasby@irell.com>, Joshua Lang <jlang@lynnllp.com>

Cc: Love Greg <Greg@stecklerlaw.com>, "Proctor, Amy" <AProctor@irell.com>, "Michael K. Hurst" <MHurst@lynnllp.com>, "He-Schaefer, Connor" <che-schaefer@irell.com>, Julia Simon <jsimon@lynnllp.com>, Tonia Ashworth <TAshworth@lynnllp.com>, QE-Valtrus <qe-valtrus@quinnemanuel.com>, Stickney Judge Paul <judgestickney@stecklerlaw.com>, "#Valtrus-Google [Int]" <Valtrus-Google@irell.com>, Gina Flores <gflores@lynnllp.com>, Haihang Wang <haihangwang@quinnemanuel.com>, Love Greg <Greg@stecklerlaw.com>, "Proctor, Amy" <AProctor@irell.com>, "Michael K. Hurst" <MHurst@lynnllp.com>, "He-Schaefer, Connor" <che-schaefer@irell.com>, Julia Simon <jsimon@lynnllp.com>, Tonia Ashworth <TAshworth@lynnllp.com>, Stickney Judge Paul <judgestickney@stecklerlaw.com>, "#Valtrus-Google [Int]" <Valtrus-Google@irell.com>, Gina Flores <gflores@lynnllp.com>, Haihang Wang <haihangwang@quinnemanuel.com>

Subject: RE: Valtrus v. Google: Extension request for recently filed motions; Valtrus II Conference

Counsel, I think there may have been some confusion here. We agree to commensurate extensions on the oppositions/ replies that relate to the motions at issue in our extension request, but not on unknown motions that may happen in the future. Of course, we intend to be reasonable and provide professional courtesy as you have here going forward.

From: Chelsea Till <ctill@lynnllp.com>

Sent: Monday, December 23, 2024 3:13 PM

To: Sheasby, Jason <JSheasby@irell.com>; Joshua Lang <jlang@lynnllp.com>

Cc: Love Greg <Greg@stecklerlaw.com>; Proctor, Amy <AProctor@irell.com>; David Perlson <davidperlson@quinnemanuel.com>; Michael K. Hurst <MHurst@lynnllp.com>; He-Schaefer, Connor <che-schaefer@irell.com>; Julia Simon <jsimon@lynnllp.com>; Tonia Ashworth <TAshworth@lynnllp.com>; QE-Valtrus <qe-valtrus@quinnemanuel.com>; Stickney Judge Paul <judgestickney@stecklerlaw.com>; #Valtrus-Google [Int] <Valtrus-Google@irell.com>; Gina Flores <gflores@lynnllp.com>; Haihang Wang <haihangwang@quinnemanuel.com>; Love Greg <Greg@stecklerlaw.com>; Proctor, Amy <AProctor@irell.com>; David Perlson <davidperlson@quinnemanuel.com>; Michael K. Hurst <MHurst@lynnllp.com>; He-Schaefer, Connor <che-schaefer@irell.com>; Julia Simon <jsimon@lynnllp.com>; Tonia Ashworth <TAshworth@lynnllp.com>; Stickney Judge Paul <judgestickney@stecklerlaw.com>; #Valtrus-Google [Int] <Valtrus-Google@irell.com>; Gina Flores <gflores@lynnllp.com>; Haihang Wang <haihangwang@quinnemanuel.com>

Subject: RE: Valtrus v. Google: Extension request for recently filed motions; Valtrus II Conference

[EXTERNAL EMAIL from ctill@lynnllp.com<<mailto:ctill@lynnllp.com>>]

Yes, that was a typo. The next two motions we file.

Thanks.

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From: Sheasby, Jason <JSheasby@irell.com<<mailto:JSheasby@irell.com>>>
Sent: Monday, December 23, 2024 5:08 PM
To: Chelsea Till <ctill@lynnllp.com<<mailto:ctill@lynnllp.com>>>; Joshua Lang
<jlang@lynnllp.com<<mailto:jlang@lynnllp.com>>>
Cc: Love Greg <Greg@stecklerlaw.com<<mailto:Greg@stecklerlaw.com>>>; Proctor, Amy
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Subject: Re: Valtrus v. Google: Extension request for recently filed motions; Valtrus II Conference

It was the next two motions

From: Chelsea Till <ctill@lynnllp.com<mailto:ctill@lynnllp.com>>
Date: Monday, December 23, 2024 at 3:07 PM
To: Jason Sheasby <JSheasby@irell.com<mailto:JSheasby@irell.com>>, Joshua Lang
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Cc: Love Greg <Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com>>, "Proctor, Amy"
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schaefer@irell.com<mailto:che-schaefer@irell.com>>, Julia Simon
<jsimon@lynnllp.com<mailto:jsimon@lynnllp.com>>, Tonia Ashworth
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<haihangwang@quinnemanuel.com<mailto:haihangwang@quinnemanuel.com>>
Subject: RE: Valtrus v. Google: Extension request for recently filed motions; Valtrus II Conference

Jason,

Your fourth stipulation is fine. We will agree to an equal extension on the next motion we file if you ask. We hope that going forward both parties can mutually agree to reasonable extensions as necessary.

Based on your email below, we will proceed with filing both motions for extensions (using the agreed upon proposed deadlines below) and mark you as unopposed.

Thank you and Merry Christmas,

CHELSEA TILL, Of Counsel
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Direct 214 292 3632

Cell 281 796 6697

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From: Sheasby, Jason <JSheasby@irell.com<<mailto:JSheasby@irell.com>>>

Sent: Monday, December 23, 2024 4:51 PM

To: Joshua Lang <jlang@lynnllp.com<<mailto:jlang@lynnllp.com>>>

Cc: Love Greg <Greg@stecklerlaw.com<<mailto:Greg@stecklerlaw.com>>>; Proctor, Amy

<AProctor@irell.com<<mailto:AProctor@irell.com>>>; Perlson David

<davidperlson@quinnemanuel.com<<mailto:davidperlson@quinnemanuel.com>>>; Michael K. Hurst

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<judgestickney@stecklerlaw.com<<mailto:judgestickney@stecklerlaw.com>>>; #Valtrus-Google [Int]

<Valtrus-Google@irell.com<<mailto:Valtrus-Google@irell.com>>>; Gina Flores

<gflores@lynnllp.com<<mailto:gflores@lynnllp.com>>>; Wang Haihang

<haihangwang@quinnemanuel.com<<mailto:haihangwang@quinnemanuel.com>>>; Love Greg

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<AProctor@irell.com<<mailto:AProctor@irell.com>>>; Perlson David

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<ctill@lynnllp.com<<mailto:ctill@lynnllp.com>>>; Tonia Ashworth

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<judgestickney@stecklerlaw.com<<mailto:judgestickney@stecklerlaw.com>>>; #Valtrus-Google [Int]

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<gflores@lynnllp.com<<mailto:gflores@lynnllp.com>>>; Wang Haihang

<haihangwang@quinnemanuel.com<<mailto:haihangwang@quinnemanuel.com>>>

Subject: Re: Valtrus v. Google: Extension request for recently filed motions; Valtrus II Conference

Josh.

On tactic you have used in the past is to demand an excessive extension and then file a motion against us that you seek to either expedite or get in front of our motions.

so the forth stipulation is you grant us the same extension on the next motions you file if we ask.

Best
JS

On Dec 23, 2024, at 2:48 PM, Joshua Lang

<jlang@lynnllp.com<<mailto:jlang@lynnllp.com><<mailto:jlang@lynnllp.com>%3cmmailto:jlang@lynnllp.com>>> wrote:

Hi Greg

Thanks for speaking with me just now. Like we discussed, we accept your original proposal as written below.

Thank you
Josh

Sent from my Verizon, Samsung Galaxy smartphone

Get Outlook for

Android<<https://aka.ms/AAb9ysg><<https://aka.ms/AAb9ysg><<https://aka.ms/AAb9ysg>%3chttps://aka.ms/AAb9ysg>>>

From: Greg Love

<Greg@stecklerlaw.com<<mailto:Greg@stecklerlaw.com><<mailto:Greg@stecklerlaw.com>%3cmmailto:Greg@stecklerlaw.com>>>

Sent: Monday, December 23, 2024 3:01:42 PM

To: Joshua Lang

<jlang@lynnllp.com<<mailto:jlang@lynnllp.com><<mailto:jlang@lynnllp.com>%3cmmailto:jlang@lynnllp.com>>>; Proctor, Amy

<AProctor@irell.com<<mailto:AProctor@irell.com><<mailto:AProctor@irell.com>%3cmmailto:AProctor@irell.com>>>; David Perlson

<davidperlson@quinnemanuel.com<<mailto:davidperlson@quinnemanuel.com><<mailto:davidperlson@quinnemanuel.com>%3cmmailto:davidperlson@quinnemanuel.com>>>

Cc: Michael K. Hurst

<MHurst@lynnllp.com<<mailto:MHurst@lynnllp.com><<mailto:MHurst@lynnllp.com>%3cmmailto:MHurst@lynnllp.com>>>; Sheasby, Jason

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<jsimon@lynnllp.com<<mailto:jsimon@lynnllp.com><<mailto:jsimon@lynnllp.com>%3cmmailto:jsimon@lynnllp.com>>>; Chelsea Till

<ctill@lynnllp.com<<mailto:ctill@lynnllp.com><<mailto:ctill@lynnllp.com>%3cmmailto:ctill@lynnllp.com>>>;

Tonia Ashworth

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Subject: Re: Valtrus v. Google: Extension request for recently filed motions; Valtrus II Conference

Josh-

1. Valtrus will not agree to take off calendar the scheduling conference before Judge Scholer scheduled for January 8th in Valtrus II.
2. As to your request for an extension on the response to the motions to consolidate in Valtrus I and II, and Valtrus' Motion to Amend the Complaint in Valtrus I, Valtrus is willing to not oppose an extension from January 8th to January 22nd so long as Google agrees not to use the agreement as a basis to delay the status conference on January 8th in Valtrus II. Please confirm.
3. Valtrus is willing to not oppose an extension from January 2nd to January 16th for Google's response to the Amended complaint in Valtrus II so long as Google agrees not to use the agreement as a basis to delay the status conference on January 8th in Valtrus II. Please confirm.

Thanks,

Greg

From: Joshua Lang

<jlang@lynnllp.com<<mailto:jlang@lynnllp.com><<mailto:jlang@lynnllp.com%3cmailto:jlang@lynnllp.com>>>>

Date: Monday, December 23, 2024 at 12:41 PM

To: Proctor, Amy

<AProctor@irell.com<<mailto:AProctor@irell.com><<mailto:AProctor@irell.com%3cmailto:AProctor@irell.com>>>>, David Perlson

<davidperlson@quinnemanuel.com<<mailto:davidperlson@quinnemanuel.com><<mailto:davidperlson@quinnemanuel.com%3cmailto:davidperlson@quinnemanuel.com>>>>, Greg Love

<Greg@stecklerlaw.com<<mailto:Greg@stecklerlaw.com><<mailto:Greg@stecklerlaw.com%3cmailto:Greg@stecklerlaw.com>>>>

Cc: Michael K. Hurst

<MHurst@lynnllp.com<<mailto:MHurst@lynnllp.com><<mailto:MHurst@lynnllp.com%3cmailto:MHurst@lynnllp.com>>>>, Sheasby, Jason

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Case 3:22-cv-00066-L Document 216-1 Filed 12/27/24 Page 9 of 40 PageID 10378
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Subject: RE: Valtrus v. Google: Extension request for recently filed motions; Valtrus II Conference Counsel,

I am following up on the email below; I also called Greg this morning to discuss our requested extensions and left a message. Please let us know your position on our requested extensions today. Given the coming holidays, we intend to file motions requesting these extensions today. If we do not hear from you, we will mark Valtrus as opposed.

Thank you,
Josh

--

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From: Joshua Lang

Sent: Friday, December 20, 2024 6:02 PM

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Subject: Valtrus v. Google: Extension request for recently filed motions; Valtrus II Conference

Counsel,

In reference to Valtrus's recent filings, Google seeks Valtrus's agreement to certain extensions given the volume of materials, the holidays, and travel plans of team members.

For Google responses to Valtrus's Motions to Consolidate in Valtrus I and Valtrus II and Valtrus's Motion to Amend the Complaint in Valtrus I, Google seeks an extension from January 8 to January 29.

For Google's response to Valtrus II Amended Complaint, Google seeks an extension from January 2 to January 16.

Additionally, as you saw, the court set a scheduling conference in Valtrus II for January 8. Given that Google has moved to dismiss and that Valtrus has sought to consolidate Valtrus I and Valtrus II, Google suggests the parties jointly contact the court to take the January hearing in Valtrus II off calendar, pending rulings on these motions.

Given the upcoming holiday, please provide your position on these as soon as possible, preferably today.

Thanks,
Josh

--

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From: Proctor, Amy

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Subject: RE: Valtrus v. Google -- Joint Statement Draft

Counsel,

We disagree with your characterizations and assumptions. Valtrus provided a draft report as discussed. Although Google would not agree to any schedule for preparation of the parties' joint report, or commit to a simultaneous exchange, Valtrus continued to work on preparing its positions for addition to that report. I have attached them here. We have not yet had the opportunity to review Google's draft, so we expect to make further edits based on Google's positions, but are providing this now as a courtesy. We look forward to working with you toward a timely Monday filing, and would be happy to discuss these issues as needed.

Best regards,
Amy

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Subject: Re: Valtrus v. Google -- Joint Statement Draft

Amy, on our call Monday you indicated you would be sending us a draft in the next day or two. Please send this evening.

David

From: Proctor, Amy

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Date: Tuesday, December 17, 2024 at 10:42 AM

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<judgetstickney@stecklerlaw.com<mailto:judgetstickney@stecklerlaw.com<mailto:judgetstickney@stecklerlaw.com%3cmailto:judgetstickney@stecklerlaw.com<mailto:judgetstickney@stecklerlaw.com%3cmailto:judgetstickney@stecklerlaw.com>>>>
Subject: RE: Valtrus v. Google -- SAP Materials
[EXTERNAL EMAIL from
aproctor@irell.com<mailto:aproctor@irell.com<mailto:aproctor@irell.com%3cmailto:aproctor@irell.com<mailto:aproctor@irell.com%3cmailto:aproctor@irell.com%3cmailto:aproctor@irell.com>>>>]

Hi David,

We are looking into your request and will try to get approval from all necessary counsel and parties, but I don't expect that will be a quick process, especially with the holidays around the corner. We will keep you updated.

Kind regards,
Amy

Amy E. Proctor (she/her) | Irell & Manella LLP
1800 Avenue of the Stars, Los Angeles, CA 90067

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Subject: Valtrus v. Google -- SAP Materials

Counsel, on our meet and confer, Valtrus indicated it intends to seek leave to amend its complaint to, among other things, add KPI as a plaintiff. In connection with and to help us consider this request, please provide unredacted filings of the briefing in Valtrus v. SAP, Civil Action No. 2:24-cv-21 (SAP I) regarding SAP's motion to dismiss for lack of standing, Valtrus's request to amend the complaint to add KPI, and any request to consolidate SAP I with Valtrus v. SAP, Civil Action No. 2:24-cv-533 (SAP II). This would include the sealed motions in SAP I, Dkts Nos. 51, 56 and 91, and all sealed exhibits thereto, all sealed opposition and reply briefs with exhibits, and all sealed orders, including Dkt. 83. This appears to be information designated confidential by Valtrus so hopefully this should not be an issue. To be clear, at this time, we are requesting the sealed filings only, not publicly available redacted briefs, exhibits, and orders.

David

From: Greg Love

<Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com%3cmmailto:Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com%3cmmailto:Greg@stecklerlaw.com%3cmmailto:Greg@stecklerlaw.com%3cmmailto:Greg@stecklerlaw.com>>>>

Sent: Thursday, December 12, 2024 6:51 AM

To: David Perlson

<davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com>>>>

Cc: Michael K. Hurst

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<jlang@lynnllp.com<mailto:jlang@lynnllp.com<mailto:jlang@lynnllp.com%3cmmailto:jlang@lynnllp.com<mailto:jlang@lynnllp.com%3cmmailto:jlang@lynnllp.com%3cmmailto:jlang@lynnllp.com>>>>; Amy Proctor

<AProctor@irell.com<mailto:AProctor@irell.com<mailto:AProctor@irell.com%3cmmailto:AProctor@irell.com<mailto:AProctor@irell.com%3cmmailto:AProctor@irell.com%3cmmailto:AProctor@irell.com>>>>; jsheasby@irell.com<mailto:jsheasby@irell.com>; che-

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<ctill@lynnllp.com<mailto:ctill@lynnllp.com<mailto:ctill@lynnllp.com%3cmmailto:ctill@lynnllp.com<mailto:ctill@lynnllp.com%3cmmailto:ctill@lynnllp.com%3cmmailto:ctill@lynnllp.com>>>>; Tonia Ashworth

<TAshworth@lynnllp.com<mailto:TAshworth@lynnllp.com<mailto:TAshworth@lynnllp.com%3cmmailto:TAshworth@lynnllp.com<mailto:TAshworth@lynnllp.com%3cmmailto:TAshworth@lynnllp.com%3cmmailto:TAshworth@lynnllp.com>>>>

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Subject: Re: Civil Action No. 3:24-cv-1795-G - Valtrus/KPI v. Google

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greg@stecklerlaw.com<mailto:greg@stecklerlaw.com<mailto:greg@stecklerlaw.com%3cmmailto:greg@stecklerlaw.com<mailto:greg@stecklerlaw.com%3cmmailto:greg@stecklerlaw.com>>>>]

David-

That time works for Valtrus.

From: David Perlson

<davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com>>>>

Date: Wednesday, December 11, 2024 at 2:29 PM

To: Greg Love

<Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com%3cmmailto:Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com%3cmmailto:Greg@stecklerlaw.com>>>>

Cc: Michael K. Hurst

<MHurst@lynnllp.com<mailto:MHurst@lynnllp.com<mailto:MHurst@lynnllp.com%3cmmailto:MHurst@lynnllp.com<mailto:MHurst@lynnllp.com%3cmmailto:MHurst@lynnllp.com>>>>, Joshua Lang

<jlang@lynnllp.com<mailto:jlang@lynnllp.com<mailto:jlang@lynnllp.com%3cmmailto:jlang@lynnllp.com<mailto:jlang@lynnllp.com%3cmmailto:jlang@lynnllp.com>>>>, Amy Proctor

<AProctor@irell.com<mailto:AProctor@irell.com<mailto:AProctor@irell.com%3cmmailto:AProctor@irell.com<mailto:AProctor@irell.com%3cmmailto:AProctor@irell.com>>>>,

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<judgetstickney@stecklerlaw.com%3mailto:judgetstickney@stecklerlaw.com%3mailto:judgetstickney@stecklerlaw.com%3mailto:judgetstickney@stecklerlaw.com%3mailto:judgetstickney@stecklerlaw.com%3mailto:judgetstickney@stecklerlaw.com>>>>

Subject: RE: Civil Action No. 3:24-cv-1795-G - Valtrus/KPI v. Google

Greg how about 2 pm central time Monday?

David

From: Greg Love

<Greg@stecklerlaw.com%3mailto:Greg@stecklerlaw.com%3mailto:Greg@stecklerlaw.com%3mailto:Greg@stecklerlaw.com%3mailto:Greg@stecklerlaw.com%3mailto:Greg@stecklerlaw.com>>>>

Sent: Wednesday, December 11, 2024 6:34 AM

To: David Perlson

<davidperlson@quinnemanuel.com%3mailto:davidperlson@quinnemanuel.com%3mailto:davidperlson@quinnemanuel.com%3mailto:davidperlson@quinnemanuel.com%3mailto:davidperlson@quinnemanuel.com>>>>

Cc: Michael K. Hurst

<MHurst@lynnllp.com%3mailto:MHurst@lynnllp.com%3mailto:MHurst@lynnllp.com%3mailto:MHurst@lynnllp.com%3mailto:MHurst@lynnllp.com%3mailto:MHurst@lynnllp.com>>>>; Joshua Lang

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y@stecklerlaw.com>>>>
Subject: Re: Civil Action No. 3:24-cv-1795-G - Valtrus/KPI v. Google

[EXTERNAL EMAIL from

greg@stecklerlaw.com<mailto:greg@stecklerlaw.com<mailto:greg@stecklerlaw.com%3cmmailto:greg@
stecklerlaw.com<mailto:greg@stecklerlaw.com%3cmmailto:greg@stecklerlaw.com%3cmmailto:greg@ste
cklerlaw.com%3cmmailto:greg@stecklerlaw.com>>>]

Thanks David.

Greg Love
Steckler Wayne Love, PLLC
107 East Main Street
Henderson, Texas 75652
903.212.4444

www.swclaw.com<<http://www.swclaw.com>>><<http://www.swclaw.com><<http://www.swclaw.com>>>><
<http://www.swclaw.com><<http://www.swclaw.com>>><e%3chttp://www.swclaw.com%3chttp://www.swcl
aw.com%3e%3e>

(Mobile Device)

On Dec 10, 2024, at 8:26 PM, David Perlson

<davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com<mailto:davidperlson@q
uinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.
com%3cmmailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com%3cm
ailto:davidperlson@quinnemanuel.com>>>> wrote:

Greg, we are available December 16. We will follow up tomorrow with a time.

David

From: Greg Love

<Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com%3cmmailto:Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com%3cmmailto:Greg@stecklerlaw.com%3cmmailto:Greg@stecklerlaw.com%3cmmailto:Greg@stecklerlaw.com>>>>

Date: Friday, December 6, 2024 at 7:35 AM

To: David Perlson

<davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com>>>>

Cc: Michael K. Hurst

<MHurst@lynnllp.com<mailto:MHurst@lynnllp.com<mailto:MHurst@lynnllp.com%3cmmailto:MHurst@lynnllp.com<mailto:MHurst@lynnllp.com%3cmmailto:MHurst@lynnllp.com%3cmmailto:MHurst@lynnllp.com>>>>, Joshua Lang

<jlang@lynnllp.com<mailto:jlang@lynnllp.com<mailto:jlang@lynnllp.com%3cmmailto:jlang@lynnllp.com<mailto:jlang@lynnllp.com%3cmmailto:jlang@lynnllp.com%3cmmailto:jlang@lynnllp.com>>>>, Amy Proctor

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<ctill@lynnllp.com<mailto:ctill@lynnllp.com<mailto:ctill@lynnllp.com%3cmmailto:ctill@lynnllp.com<mailto:ctill@lynnllp.com%3cmmailto:ctill@lynnllp.com>>>>, Tonia Ashworth

<TAshworth@lynnllp.com<mailto:TAshworth@lynnllp.com<mailto:TAshworth@lynnllp.com%3cmmailto:TAshworth@lynnllp.com<mailto:TAshworth@lynnllp.com%3cmmailto:TAshworth@lynnllp.com>>>>, QE-Valtrus <qe-valtrus@quinnemanuel.com<mailto:qe-valtrus@quinnemanuel.com<mailto:qe-valtrus@quinnemanuel.com%3cmmailto:qe-valtrus@quinnemanuel.com<mailto:qe-valtrus@quinnemanuel.com%3cmmailto:qe-valtrus@quinnemanuel.com>>>>, Judge Paul Stickney

<judgestickney@stecklerlaw.com<mailto:judgestickney@stecklerlaw.com<mailto:judgestickney@stecklerlaw.com%3cmmailto:judgestickney@stecklerlaw.com<mailto:judgestickney@stecklerlaw.com%3cmmailto:judgestickney@stecklerlaw.com>>>>

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Subject: Re: Civil Action No. 3:24-cv-1795-G - Valtrus/KPI v. Google

[EXTERNAL EMAIL from

greg@stecklerlaw.com<mailto:greg@stecklerlaw.com<mailto:greg@stecklerlaw.com%3cmmailto:greg@stecklerlaw.com<mailto:greg@stecklerlaw.com%3cmmailto:greg@stecklerlaw.com%3cmmailto:greg@stecklerlaw.com%3cmmailto:greg@stecklerlaw.com>>>>]

David & Michael-

In light of the court's order lifting the stay, we need to meet and confer regarding the joint management statement as outlined in Misc. Order 62. The Valtrus team is available December 16th for a conference call to discuss.

Can you or someone from your side be available December 16th to meet/confer?

Greg Love

Steckler Wayne Love, PLLC

107 East Main Street

Henderson, Texas 75652

903.212.4444

www.stecklerlaw.com<<http://www.stecklerlaw.com>>><<http://www.stecklerlaw.com><<http://www.stecklerlaw.com>>>><<http://www.stecklerlaw.com><<http://www.stecklerlaw.com>>><e%3chttp://www.stecklerlaw.com%3chttp://www.stecklerlaw.com%3e%3e>

On Nov 19, 2024, at 10:05 AM, David Perlson

<davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com>>>> wrote:

Yes that time works thanks.

From: Michael K. Hurst

<MHurst@lynnllp.com<mailto:MHurst@lynnllp.com<mailto:MHurst@lynnllp.com%3cmmailto:MHurst@lynnllp.com<mailto:MHurst@lynnllp.com%3cmmailto:MHurst@lynnllp.com%3cmmailto:MHurst@lynnllp.com>>>>

Sent: Tuesday, November 19, 2024 7:29:14 AM

To: Greg Love

<Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com%3cmmailto:Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com%3cmmailto:Greg@stecklerlaw.com%3cmmailto:Greg@stecklerlaw.com>>>>

Cc: Joshua Lang

<jlang@lynnllp.com<mailto:jlang@lynnllp.com<mailto:jlang@lynnllp.com%3cmmailto:jlang@lynnllp.com<mailto:jlang@lynnllp.com%3cmmailto:jlang@lynnllp.com%3cmmailto:jlang@lynnllp.com>>>>; Amy Proctor

<AProctor@irell.com<mailto:AProctor@irell.com<mailto:AProctor@irell.com%3cmmailto:AProctor@irell.com<mailto:AProctor@irell.com%3cmmailto:AProctor@irell.com%3cmmailto:AProctor@irell.com%3cmmailto:AProctor@irell.com>>>>;jsheasby@irell.com<mailto:jsheasby@irell.com>
<jsheasby@irell.com<mailto:jsheasby@irell.com<mailto:jsheasby@irell.com%3cmmailto:jsheasby@irell.com<mailto:jsheasby@irell.com%3cmmailto:jsheasby@irell.com%3cmmailto:jsheasby@irell.com%3cmmailto:jsheasby@irell.com>>>>; che-schaefer@irell.com<mailto:che-schaefer@irell.com<mailto:che-schaefer@irell.com<mailto:che-schaefer@irell.com%3cmmailto:che-schaefer@irell.com<mailto:che-schaefer@irell.com%3cmmailto:che-schaefer@irell.com%3cmmailto:che-schaefer@irell.com>>>> <che-schaefer@irell.com<mailto:che-schaefer@irell.com<mailto:che-schaefer@irell.com%3cmmailto:che-schaefer@irell.com<mailto:che-schaefer@irell.com%3cmmailto:che-schaefer@irell.com%3cmmailto:che-schaefer@irell.com%3cmmailto:che-schaefer@irell.com>>>>; Julia Simon
<jsimon@lynnllp.com<mailto:jsimon@lynnllp.com<mailto:jsimon@lynnllp.com%3cmmailto:jsimon@lynnllp.com<mailto:jsimon@lynnllp.com%3cmmailto:jsimon@lynnllp.com%3cmmailto:jsimon@lynnllp.com%3cmmailto:jsimon@lynnllp.com>>>>; Chelsea Till
<ctill@lynnllp.com<mailto:ctill@lynnllp.com<mailto:ctill@lynnllp.com%3cmmailto:ctill@lynnllp.com<mailto:ctill@lynnllp.com%3cmmailto:ctill@lynnllp.com%3cmmailto:ctill@lynnllp.com>>>>; Tonia Ashworth
<TAshworth@lynnllp.com<mailto:TAshworth@lynnllp.com<mailto:TAshworth@lynnllp.com%3cmmailto:TAshworth@lynnllp.com<mailto:TAshworth@lynnllp.com%3cmmailto:TAshworth@lynnllp.com%3cmmailto:TAshworth@lynnllp.com>>>>; David Perlson
<davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com>>>>; QE-Valtrus <qe-valtrus@quinnemanuel.com<mailto:qe-valtrus@quinnemanuel.com<mailto:qe-valtrus@quinnemanuel.com%3cmmailto:qe-valtrus@quinnemanuel.com%3cmmailto:qe-valtrus@quinnemanuel.com%3cmmailto:qe-valtrus@quinnemanuel.com%3cmmailto:qe-valtrus@quinnemanuel.com>>>>; Judge Paul Stickney
<judgestickney@stecklerlaw.com<mailto:judgestickney@stecklerlaw.com<mailto:judgestickney@stecklerlaw.com%3cmmailto:judgestickney@stecklerlaw.com%3cmmailto:judgestickney@stecklerlaw.com%3cmmailto:judgestickney@stecklerlaw.com%3cmmailto:judgestickney@stecklerlaw.com>>>>
Subject: RE: Civil Action No. 3:24-cv-1795-G - Valtrus/KPI v. Google

[EXTERNAL EMAIL from

mhurst@lynnllp.com<mailto:mhurst@lynnllp.com<mailto:mhurst@lynnllp.com%3cmmailto:mhurst@lynnllp.com<mailto:mhurst@lynnllp.com%3cmmailto:mhurst@lynnllp.com%3cmmailto:mhurst@lynnllp.com%3cmmailto:mhurst@lynnllp.com>>>]

I'm in mediation, but can hopefully pop out. David, are you available?

MICHAEL K. HURST, Partner
Board Certified – Civil Trial Law
Texas Board of Legal Specialization

Board Certified – Civil Trial Advocate
National Board of Trial Advocacy

Lynn Pinker Hurst & Schwegmann

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mhurst@lynllp.com<mailto:mhurst@lynllp.com<mailto:mhurst@lynllp.com%3cmailto:mhurst@lynllp.com<mailto:mhurst@lynllp.com%3cmailto:mhurst@lynllp.com%3cmailto:mhurst@lynllp.com%3cmailto:mhurst@lynllp.com>>>

Top 100 Lawyers in Texas and DFW – Super Lawyers

Top Commercial Litigation Lawyer in DFW – Chambers & Partners

Lawyer of the Year – Best Lawyers (2021, 2023)

Best Lawyers Hall of Fame – D Magazine (2022)

<image001.jpg>

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From: Greg Love

<Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com%3cmmailto:Greg@stecklerlaw.com>>>

Sent: Tuesday, November 19, 2024 8:19 AM

To: Michael K. Hurst

<MHurst@lynnllp.com<mailto:MHurst@lynnllp.com<mailto:MHurst@lynnllp.com%3cmailto:MHurst@lynnllp.com>>>

Cc: Joshua Lang

<jlang@lynnllp.com<mailto:jlang@lynnllp.com<mailto:jlang@lynnllp.com%3cmmailto:jlang@lynnllp.com
>>>; Amy Proctor

<AProctor@irell.commailto:AProctor@irell.commailto:AProctor@irell.com%3cmmailto:AProctor@irell.com>>>;jsheasby@irell.commailto:jsheasby@irell.com; che-schaefer@irell.commailto:che-schaefer@irell.commailto:che-schaefer@irell.com%3cmmailto:che-schaefer@irell.com>>; Julia Simon<jsimon@lynnllp.commailto:jsimon@lynnllp.commailto:jsimon@lynnllp.com%3cmmailto:jsimon@lynnllp.com>>>; Chelsea Till

<ctill@lynnllp.com<mailto:ctill@lynnllp.com<mailto:ctill@lynnllp.com%3cmmailto:ctill@lynnllp.com>>>;
Tonia Ashworth

<TAshworth@lynnllp.com<mailto:TAshworth@lynnllp.com<mailto:TAshworth@lynnllp.com%3cmailto:T
Ashworth@lynnllp.com>>>; David Perlson

<davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com><mailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com>>>; QE-Valtrus <qe-

valtrus@quinnemanuel.com<mailto:ge-valtrus@quinnemanuel.com><mailto:ge-

valtrus@quinnemanuel.com%3cmailto:ge-valtrus@quinnemanuel.com>>>; Judge Paul Stickney

<judgestickney@stecklerlaw.com<mailto:judgestickney@stecklerlaw.com<mailto:judgestickney@stecklerlaw.com%3cmailto:judgestickney@stecklerlaw.com>>>

Michael-

We are available for a call at 3 pm CT today. If this still works for your team, I will send an invite.

Thanks.

Greg Love
Steckler Wayne Love, PLLC
107 East Main Street
Henderson, Texas 75652
903.212.4444

www.stecklerlaw.com<<http://www.stecklerlaw.com>>><<http://www.stecklerlaw.com><<http://www.stecklerlaw.com>>>><<http://www.stecklerlaw.com><<http://www.stecklerlaw.com>>>><e%3chttp://www.stecklerlaw.com/%3chttp://www.stecklerlaw.com/%3e%3e>

On Nov 18, 2024, at 6:32 PM, Greg Love

<Greg@stecklerlaw.com<<mailto:Greg@stecklerlaw.com><<mailto:Greg@stecklerlaw.com>%3c<mailto:Greg@stecklerlaw.com>>>> wrote:

Michael-

Still working on availability for our team. Will let you know hopefully early AM tomorrow.

Get Outlook for

iOS<<https://aka.ms/o0ukef><<https://aka.ms/o0ukef>><<https://aka.ms/o0ukef><<https://aka.ms/o0ukef>>>>

From: Michael K. Hurst

<MHurst@lynnllp.com<<mailto:MHurst@lynnllp.com><<mailto:MHurst@lynnllp.com>%3c<mailto:MHurst@lynnllp.com>>>>

Sent: Sunday, November 17, 2024 11:26:02 AM

To: Greg Love

<Greg@stecklerlaw.com<<mailto:Greg@stecklerlaw.com><<mailto:Greg@stecklerlaw.com>%3c<mailto:Greg@stecklerlaw.com>>>>

Cc: Joshua Lang

<jlang@lynnllp.com<<mailto:jlang@lynnllp.com><<mailto:jlang@lynnllp.com>%3c<mailto:jlang@lynnllp.com>>>>

<AProctor@irell.com<<mailto:AProctor@irell.com><<mailto:AProctor@irell.com>%3c<mailto:AProctor@irell.com>>>>

<jsheasby@irell.com<<mailto:jsheasby@irell.com><<mailto:jsheasby@irell.com>%3c<mailto:jsheasby@irell.com>>>>

<che-schaefer@irell.com<<mailto:che-schaefer@irell.com><<mailto:che-schaefer@irell.com>%3c<mailto:che-schaefer@irell.com>>>>

<jsimon@lynnllp.com<mailto:jsimon@lynnllp.com<mailto:jsimon@lynnllp.com%3cmailto:jsimon@lynnllp.com>>>; Chelsea Till
<ctill@lynnllp.com<mailto:ctill@lynnllp.com<mailto:ctill@lynnllp.com%3cmailto:ctill@lynnllp.com>>>; Tonia Ashworth
<TAshworth@lynnllp.com<mailto:TAshworth@lynnllp.com<mailto:TAshworth@lynnllp.com%3cmailto:TAshworth@lynnllp.com>>>; David Perlson
<davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com%3cmailto:davidperlson@quinnemanuel.com>>>; QE-Valtrus <qe-
valtrus@quinnemanuel.com<mailto:qe-valtrus@quinnemanuel.com<mailto:qe-
valtrus@quinnemanuel.com%3cmailto:qe-valtrus@quinnemanuel.com>>>; Judge Paul Stickney
<judgestickney@stecklerlaw.com<mailto:judgestickney@stecklerlaw.com<mailto:judgestickney@stecklerlaw.com%3cmailto:judgestickney@stecklerlaw.com>>>
Subject: RE: Civil Action No. 3:24-cv-1795-G - Valtrus/KPI v. Google

Tuesday between 2 and 4 CST?

MICHAEL K. HURST, Partner
Board Certified – Civil Trial Law
Texas Board of Legal Specialization

Board Certified – Civil Trial Advocate
National Board of Trial Advocacy

Lynn Pinker Hurst & Schwegmann

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mhurst@lynnllp.com<mailto:mhurst@lynnllp.com<mailto:mhurst@lynnllp.com%3cmailto:mhurst@lynnllp.com>>>

Top 100 Lawyers in Texas and DFW – Super Lawyers
Top Commercial Litigation Lawyer in DFW – Chambers & Partners
Lawyer of the Year – Best Lawyers (2021, 2023)
Best Lawyers Hall of Fame – D Magazine (2022)

<image001.jpg>

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From: Greg Love

<Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com%3cmailto:Greg@stecklerlaw.com>>>

Sent: Friday, November 15, 2024 7:56 AM

To: Michael K. Hurst

<MHurst@lynnllp.com<mailto:MHurst@lynnllp.com<mailto:MHurst@lynnllp.com%3cmailto:MHurst@lynnllp.com>>>

Cc: Joshua Lang

<jlang@lynnllp.com<mailto:jlang@lynnllp.com<mailto:jlang@lynnllp.com%3cmailto:jlang@lynnllp.com>>>; Amy Proctor

<AProctor@irell.com<mailto:AProctor@irell.com<mailto:AProctor@irell.com%3cmailto:AProctor@irell.com>>>; jsheasby@irell.com<mailto:jsheasby@irell.com>; che-schaefer@irell.com<mailto:che-

schaefer@irell.com<mailto:che-schaefer@irell.com%3cmailto:che-schaefer@irell.com>>>; Julia Simon <jsimon@lynnllp.com<mailto:jsimon@lynnllp.com<mailto:jsimon@lynnllp.com%3cmailto:jsimon@lyn

nnllp.com>>>; Chelsea Till

<ctill@lynnllp.com<mailto:ctill@lynnllp.com<mailto:ctill@lynnllp.com%3cmailto:ctill@lynnllp.com>>>; Tonia Ashworth

<TAshworth@lynnllp.com<mailto:TAshworth@lynnllp.com<mailto:TAshworth@lynnllp.com%3cmailto:TAshworth@lynnllp.com>>>; David Perlson

<davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com%3cmailto:davidperlson@quinnemanuel.com>>>; QE-Valtrus <qe-

valtrus@quinnemanuel.com<mailto:qe-valtrus@quinnemanuel.com<mailto:qe-

valtrus@quinnemanuel.com%3cmailto:qe-valtrus@quinnemanuel.com>>>; Judge Paul Stickney

<judgestickney@stecklerlaw.com<mailto:judgestickney@stecklerlaw.com<mailto:judgestickney@stecklerlaw.com%3cmailto:judgestickney@stecklerlaw.com>>>

Subject: Re: Civil Action No. 3:24-cv-1795-G - Valtrus/KPI v. Google

Michael-

Monday doesn't work for us. Tuesday or Wednesday would be best.

Greg Love

Steckler Wayne Love, PLLC

107 East Main Street

Henderson, Texas 75652

903.212.4444

www.stecklerlaw.com<<http://www.stecklerlaw.com>>><<http://www.stecklerlaw.com><<http://www.stecklerlaw.com>>>><<http://www.stecklerlaw.com/>>><[http://www.stecklerlaw.com/%3chttp://www.stecklerlaw.com/%3e%3e](http://www.stecklerlaw.com/%3chttp://www.stecklerlaw.com/%3chttp://www.stecklerlaw.com/%3e%3e)>

(Mobile Device)

On Nov 14, 2024, at 5:24 PM, Michael K. Hurst

<MHurst@lynnllp.com<mailto:MHurst@lynnllp.com<mailto:MHurst@lynnllp.com%3cmailto:MHurst@lynnllp.com>>> wrote:

4:30 on Monday?

MICHAEL K. HURST, Partner

Board Certified – Civil Trial Law
Texas Board of Legal Specialization

Board Certified – Civil Trial Advocate
National Board of Trial Advocacy

Lynn Pinker Hurst & Schwegmann

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mhurst@lynnllp.com<mailto:mhurst@lynnllp.com<mailto:mhurst@lynnllp.com%3cmailto:mhurst@lynnllp.com>>>

Top 100 Lawyers in Texas and DFW – Super Lawyers
Top Commercial Litigation Lawyer in DFW – Chambers & Partners
Lawyer of the Year – Best Lawyers (2021, 2023)
Best Lawyers Hall of Fame – D Magazine (2022)

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On Nov 14, 2024, at 11:55 AM, Greg Love

<Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com%3cmailto:Greg@stecklerlaw.com>>> wrote:

Michael-

Are you and your team available for a call next week to discuss?

Greg Love
Steckler Wayne & Love PLLC
East Texas Office
903.212.4444

From: Michael K. Hurst

<MHurst@lynnllp.com<mailto:MHurst@lynnllp.com<mailto:MHurst@lynnllp.com%3cmailto:MHurst@lynnllp.com>>>

Sent: Wednesday, October 30, 2024 4:53 PM

To: Greg Love

<Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com%3cmailto:Greg@stecklerlaw.com>>>

Cc: Joshua Lang

<jlang@lynnllp.com<mailto:jlang@lynnllp.com<mailto:jlang@lynnllp.com%3cmailto:jlang@lynnllp.com>>>; Amy Proctor

<AProctor@irell.com<mailto:AProctor@irell.com<mailto:AProctor@irell.com%3cmailto:AProctor@irell.com>>>;

jsheasby@irell.com<mailto:jsheasby@irell.com><jsheasby@irell.com<mailto:jsheasby@irell.com<mailto:jsheasby@irell.com%3cmailto:jsheasby@irell.com%3e%3cjsheasby@irell.com%3cmailto:jsheasby@irell.com>>>; che-schaefer@irell.com<mailto:che-schaefer@irell.com><che-schaefer@irell.com<mailto:che-schaefer@irell.com<mailto:che-schaefer@irell.com%3cmailto:che-schaefer@irell.com%3e%3cche-schaefer@irell.com%3cmailto:che-schaefer@irell.com>>>; Julia Simon

<jsimon@lynnllp.com<mailto:jsimon@lynnllp.com<mailto:jsimon@lynnllp.com%3cmailto:jsimon@lynnllp.com>>>; Chelsea Till

<ctill@lynnllp.com<mailto:ctill@lynnllp.com<mailto:ctill@lynnllp.com%3cmailto:ctill@lynnllp.com>>>; Tonia Ashworth

<TAshworth@lynnllp.com<mailto:TAshworth@lynnllp.com<mailto:TAshworth@lynnllp.com%3cmailto:TAshworth@lynnllp.com>>>; David Perlson

<davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com%3cmailto:davidperlson@quinnemanuel.com>>>; QE-Valtrus <qe-valtrus@quinnemanuel.com<mailto:qe-valtrus@quinnemanuel.com<mailto:qe-valtrus@quinnemanuel.com%3cmailto:qe-valtrus@quinnemanuel.com>>>

Subject: Re: Civil Action No. 3:24-cv-1795-G - Valtrus/KPI v. Google

Greg, I hope you're well. Now that the Court granted our extension to file a responsive pleading, we would like to know how Valtrus intends to proceed with this case so that we can respond accordingly. Thank you and regards,

Michael

MICHAEL K. HURST, Partner
Board Certified – Civil Trial Law
Texas Board of Legal Specialization

Board Certified – Civil Trial Advocate
National Board of Trial Advocacy

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On Oct 18, 2024, at 3:37 PM, Greg Love
<Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com%3cmmailto:Greg@stecklerlaw.com>>> wrote:
Thanks Michael. Valtrus agrees to the additional 15 days as a professional courtesy, and hopes Google will extend the same to Valtrus if the need arises. Have a good weekend.

Greg Love
Steckler Wayne Love, PLLC
107 East Main Street
Henderson, Texas 75652
903.212.4444
www.stecklerlaw.com<<http://www.stecklerlaw.com>>><<http://www.stecklerlaw.com><<http://www.stecklerlaw.com>>>><<http://www.stecklerlaw.com/><<http://www.stecklerlaw.com/>>><e%3chttp://www.stecklerlaw.com/%3chttp://www.stecklerlaw.com/%3e%3e>

On Oct 18, 2024, at 4:34 PM, Michael K. Hurst
<MHurst@lynnllp.com<mailto:MHurst@lynnllp.com<mailto:MHurst@lynnllp.com%3cmailto:MHurst@lynnllp.com>>> wrote:

Thanks Greg. To answer you, certainly the fact that we still don't know how y'all plan to proceed, along with the complicated record of the motions to dismiss and procedural motions in the other cases that we would like to review, and the apparent lack of any urgency would support our request. Again, I would really appreciate the courtesy of the additional 15 days. Thanks, Greg.

Michael

MICHAEL K. HURST, Partner
Board Certified – Civil Trial Law
Texas Board of Legal Specialization

Board Certified – Civil Trial Advocate

Lynn Pinker Hurst & Schwegmann

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Main 214 981 3800

mhurst@lynnllp.com<mailto:mhurst@lynnllp.com<mailto:mhurst@lynnllp.com%3cmmailto:mhurst@lynnllp.com>>

Top 100 Lawyers in Texas and DFW – Super Lawyers

Top Commercial Litigation Lawyer in DFW – Chambers & Partners

Lawyer of the Year – Best Lawyers (2021, 2023)

Best Lawyers Hall of Fame – D Magazine (2022)

<image001.jpg>

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From: Greg Love

<Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com%3cmmailto:Greg@stecklerlaw.com>>>

Sent: Friday, October 18, 2024 12:55 PM

To: Michael K. Hurst

<MHurst@lynnllp.com<mailto:MHurst@lynnllp.com<mailto:MHurst@lynnllp.com%3cmmailto:MHurst@lynnllp.com>>>

Cc: Joshua Lang

<jlang@lynnllp.com<mailto:jlang@lynnllp.com<mailto:jlang@lynnllp.com%3cmmailto:jlang@lynnllp.com>>>; Amy Proctor

<AProctor@irell.com<mailto:AProctor@irell.com<mailto:AProctor@irell.com%3cmmailto:AProctor@irell.com>>>; jsheasby@irell.com<mailto:jsheasby@irell.com>; che-schaefer@irell.com<mailto:che-

schaefer@irell.com<mailto:che-schaefer@irell.com%3cmmailto:che-schaefer@irell.com>>; Julia Simon <jsimon@lynnllp.com<mailto:jsimon@lynnllp.com<mailto:jsimon@lynnllp.com%3cmmailto:jsimon@lynnllp.com>>>; Chelsea Till

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valtrus@quinnemanuel.com<mailto:qe-valtrus@quinnemanuel.com<mailto:qe-valtrus@quinnemanuel.com%3cmmailto:qe-valtrus@quinnemanuel.com>>>

Subject: Re: Civil Action No. 3:24-cv-1795-G - Valtrus/KPI v. Google

What would prevent you from filing a responsive pleading in 30 days?

Greg Love

Steckler Wayne Love, PLLC

107 East Main Street

Henderson, Texas 75652

903.212.4444

[illegible]

(Mobile Device)

On Oct 18, 2024, at 1:45 PM, Michael K. Hurst

<MHurst@lynnllp.com<mailto:MHurst@lynnllp.com<mailto:MHurst@lynnllp.com%3cmailto:MHurst@lynnllp.com>>> wrote:

Greg, thank you for agreeing to at least 30 days. However, I am again respectfully requesting 45 days. We had been trying to reach you many times to get an answer to our simple request for an extension of 45 days, then only under threat of motion practice do you respond saying you agree to only 30 days. As you know, in the complaint Valtrus indicates that it does even intend to proceed with this case, but rather will seek to stay it. And despite our repeated requests for an answer as to how, if at all, Valtrus intends to proceed in this case you haven't told us this either. This makes your refusal to agree to 45 days seem all the more unreasonable and confusing. Please let me know. Thank you for your courtesies,

MICHAEL K. HURST, Partner

Board Certified – Civil Trial Law

Texas Board of Legal Specialization

Board Certified – Civil Trial Advocate

National Board of Trial Advocacy

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Top 100 Lawyers in Texas and DFW – Super Lawyers

Top Commercial Litigation Lawyer in DFW – Chambers & Partners

Lawyer of the Year – Best Lawyers (2021, 2023)

Best Lawyers Hall of Fame – D Magazine (2022)

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From: Greg Love

<Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com%3cmmailto:Greg@stecklerlaw.com>>>

Sent: Friday, October 18, 2024 6:11 AM

To: Joshua Lang

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Cc: Amy Proctor

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Subject: Re: Civil Action No. 3:24-cv-1795-G - Valtrus/KPI v. Google

Josh,

Valtrus will not oppose an extension request of 30 days.

Greg Love

Steckler Wayne Love, PLLC

107 East Main Street

Henderson, Texas 75652

903.212.4444

www.swclaw.com<<http://www.swclaw.com>>><<http://www.swclaw.com><<http://www.swclaw.com>>>><<http://www.swclaw.com/><<http://www.swclaw.com/>>><e%3chttp://www.swclaw.com/%3chttp://www.s

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>>> wrote:

I write concerning our attempts to confer on this matter. Last week, I reached out to Mr. Love's office to discuss an extension of our deadline to respond to the complaint and to inquire on how Plaintiffs intend to proceed with this second matter, given the related matter presently pending (and stayed) before Chief Judge Godbey (Civil Action No. 3:22-cv-00066-N). Mr. Love and I could not connect, and I left a message with his receptionist. This week, although Mr. Love and I were able to connect on Tuesday, he indicated that he needed to speak with his team at Irell. Yesterday, he indicated that he was able to connect with his team and expected to have a response to us today. We still have not received a response.

Accordingly, tomorrow, we will file a motion to extend our deadline to respond to the complaint. We will file the motion as an opposed motion unless we hear otherwise. Additionally, given the fact that that our response deadline is quickly approaching, we intend to mark the motion as expedited.

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>

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